



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION 5
 77 WEST JACKSON BOULEVARD
 CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

LU-9J

Via Certified Mail No. 7009 1680 0000 7671 1142 and Electronic copy

March 12, 2013,

Mr. Gerald Ruopp
 Techalloy Company, Inc
 6509 Olson Road
 Union, Illinois 60180

Re: Revised 2012 RCRA Corrective Measures Implementation Field Investigation Report and Autumnwood ESH Consultants November 20, 2012 Letter Central Wire, Site Techalloy Company, EPA ID # ILD 005 178 975, Administrative Order on Consent (AOC), Docket No. R8H-5-99-008

Dear Mr. Ruopp,

This letter is in reference to Central Wire's (CW) Revised 2012 RCRA Corrective Measures Implementation Field Investigation Report submitted to the United States Environmental Protection Agency (EPA) dated November 2012, Autumnwood ESH Consultants February 12, 2013 letter, and Revised October Monthly Report. EPA comments on the report are attached. Please respond within 45 days.

Should you have any questions, regarding this letter, need any additional information, or wish to discuss this matter further, please contact me at (312) 353-1243 or contact me by e-mail to nordine.john@epa.gov.

Sincerely,

John Nordine, CPG, LPG
 Project Manager
 Corrective Action Section 2

Cc: Karen Peaceman, U.S. EPA
 Jack Thorsen, Autumnwood ESH Consultants

Attachment: EPA Comments on revised 2012 RCRA Corrective Measures Implementation Field Investigation Report, Autumnwood ESH Consultants November 20, 2012 letter, and revised October Monthly Report.

ATTACHMENT

A. If Techalloy got rid of the breaks in the data they could get a complete graph of the water levels in September and early October rather than having to break the plots up into several graphs which show some odd data, and breaks in the data. At least this presentation is possible with my version of Excel. Techalloy's graphs are inadequate to support this discussion and need to be improved. They should look more like the plot for September 29-October 2, 2012 than the rest of the plots.

B. For the water-level trends in DGW-2I noted on September 24-October 3, 2013, 0.5 ft of water-level decline was observed in the well during this period, when the irrigation well(s) were pumped for 26 and 58 hours. Bob Kay (USGS) checked the USGS groundwater level data from wells open to the glacial drift west of Marengo during this time period and the water-level change showed a downward spike of about 0.2 to 0.8 ft during this time period, with a 0.8 ft downward spike on October 1, 2012. This trough was clearly related to pumping, but almost certainly not the Sod farm wells. The data from another other wells north of Union shows a slight ((0.05 ft) downward trend. Basically the closest background well shows no change during this time period.

C. Techalloy is correct that most of the 0.5 ft drop in water level occurred from the evening of September 23, 2012, through the early afternoon of September 25, but I don't see how this drop can be related to precipitation--either its presence or absence. The decline in water level is fairly precipitous and occurs mainly on the 24th. Because there had been some decline in water levels likely before the time of measurement of 0 pumping hours on September 24, this decline is not clearly related to pumping, but it seems to be more closely attributable to pumping than precipitation.

D. There were other fairly large decreases in water level at DGW-2I in September 2012 like the about 0.7 ft drop on the 14th through the 17th. Can Techalloy provide pumping data for the period before September 24? It's helpful to have the pumping and water-level data for the full period of record or at least for the full period of record covered by this (and each prior) monthly report. EPA requires a month by month analysis of ALL the water level and pumping data to more clearly determine what's going on here, at least for this calendar year. EPA was hoping we could look at a few time periods to see at pattern, but one time period is insufficient, and the pattern it shows is ambiguous.

Trends in P&T Influent Concentrations: again, these graphs need to be improved.

The top plot is somewhat OK, but would benefit from "Concentration, in micrograms per liter" as the Y axis label and should have some sort of dot to denote the actual date the sample was collected, use of just lines leaves the actual sampling date unclear. Remember, plots should be fully explanatory, stand alone presentations of data. We may now what "conc'n" means, but that doesn't mean other readers will.

The middle plot needs a better title, so the reader knows which well this data comes from. It also needs the improvements suggested for the top graph.

Bottom plot also needs improvements suggested for the top graph.

Note VOC concentrations are down in well 1, and generally up in well 2. The Well 2 is located southwest of Well 1 and less in line with the area of geoprobe investigation than well 1.

Definition of the location and extent of the plume west of well 2 and south of the geoprobed area should be completed.

GENERAL COMMENT ON ALL THE PLOTS OF WELL DATA

Most or all of the plots could stand improvement. Techalloy should check to make sure all of the graph titles (they tend to vary from well to well) and axis titles/labels, what data is presented in the tables, etc. are consistent and correct. They should re-check the data to make sure the plots are accurate. EPA was noted issues on some plots, but Techalloy should make sure all comments are appropriately applied to all the graphs.

MW-2.xls--previous comments about axis labels and highlighting the sample dates apply. Plot the TCA data, there are at least 2 MCL exceedences according to the table. Some of the subsequent table's present all/most of the chlorinated ethene and ethane results, even if non-detects. Consider doing that for all the wells so the reader knows what was analyzed for. This data presentation alongside the plots isn't necessary if all the data is presented in a table in the reports, but it needs to be noted somewhere the reader can check it.

What's going on with the tables presented above the plots? They seem to show inorganic data for "Tech" series wells that have no apparent relation to the wells being plotted. Techalloy needs to re-present these data in a clear way.

MW4.xls--this is how the y-axis title and the data plots should look. However, the boxes on the x-axis should be gotten rid of, as should the concentration data and the poor placement of the axis title. In addition, the numbers on the graph and the numbers on the table don't match. This data needs to be corrected and re-presented.

MW5.xls--consider requiring plotting the j-95 data. It'll expand the graph and make the other data a bit harder to follow (unless the graph scale is expanded) but it'll improve the data coverage. Revise the title. It's incorrect as written.

DGW-1I: plot the early data.

DGW-1D: plot the D-12 data.

December 2012 Monthly Progress Report

Again, the data to be presented in the appendices needs to be complete and properly presented. A figure showing the location of all of these wells also needs to be presented with this report.

Techalloy needs to provide the information with a comprehensive presentation of the data and is updated whenever new data becomes available. However, we also asked for some analysis of

the data, and it isn't here. If Techalloy is going to use this report to provide their "state of the site" analysis, they need to discuss the state of the site, not just present the data.

January 2013 Monthly Report:

In our January 2013 meeting with Techalloy agreed to provide a maps showing the plume (plan view and cross section) and the potentiometric surface of the aquifer. In addition to figures and tables that need upgrading to be "publication ready" there is a lack of analysis of the water level and water-quality data through space and time.